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*Attorney for Plaintiff*  
*Gateway Overseas Inc.*

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

..... X

**GATEWAY OVERSEAS INC.,**

Plaintiff,

05 Civ. 4260 (GBD)

**ATTORNEY AFFIRMATION  
IN OPPOSITION TO  
DEFENDANT'S CROSS-  
MOTION TO DISMISS  
AND IN SUPPORT OF  
PLAINTIFF'S (REPLY)  
MOTION FOR  
PRELIMINARY  
INJUNCTION**

- against -

**NISHAT (CHUNIAN) LIMITED AND GORDON  
EAST,**

Defendants.

..... X

Sanjay Chaubey, Esq., an attorney admitted to practice of law before this court,  
affirms and deposes as under:

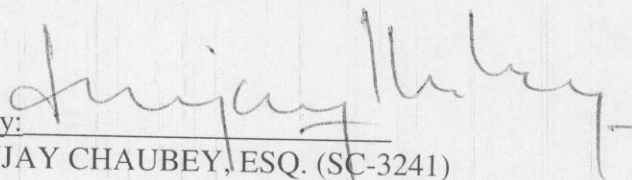
1. I am the attorney of record for the Plaintiff and am not a party to this case.  
I am familiar with all of the papers and proceedings in this action, and  
with all facts and circumstances set forth below.



2. I make this affirmation in opposition to Defendant's cross-motion to dismiss and in support of Plaintiff's motion for a preliminary injunction.
3. Defendant has a meritorious case, and defenses against the Plaintiffs complaint as more fully set forth in Defendants accompanying affidavit.
4. Annexed hereto as Exhibit 'A1' is a true and correct copy of Affidavit of Madhusudan Wagh, Director of the Plaintiff Corporation.
5. Annexed hereto as Exhibit 'A' collectively are true and correct copies of email exchange between Defendant no. 2 Gordon East and Madhusudan Wagh, Director of the Plaintiff Corporation.
6. Annexed hereto as Exhibit 'B' collectively are true and correct copies of news magazine article, Home Textile Today dated March 21, 2005.
7. Annexed hereto as Exhibit 'C' collectively are true and correct copies Nishat Mills Limited's Brochure & Presentation material.
8. Annexed hereto as Exhibit 'D' is a true and correct copy the Commission Agreement dated February 28, 2000.

Dated: New York, New York  
January 30, 2006

LAW OFFICES OF SANJAY CHAUBEY

By:   
SANJAY CHAUBEY, ESQ. (SC-3241)

Attorneys for Plaintiff

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